

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

CARL FORSELL

Plaintiff,

VS.

SQUIRRELS, LLC, et al.

Defendants.

Case No: 22-cv-01454

Judge: Lioi

Magistrate Judge: Henderson

MOTION TO CONTINUE FINAL PRETRIAL AND TRIAL

NOW COMES Plaintiff, Carl Forsell (hereinafter 'Mr. Forsell'), by and through undersigned counsel and in accordance with the Court's September 19, 2024 Order, hereby respectfully submits a refiled Motion to Continue the Final Pretrial, scheduled for June 18, 2025, and Trial scheduled for July 11, 2025. *See Order on Mot. to Continue*, Sep. 19, 2024, [ECF 51]. For cause, Mr. Forsell contends that he will be unable to appear in person at the Pretrial or Trial until November 2025 pursuant to a travel restriction that he is currently under which prohibits him from traveling outside of Singapore, where he currently resides. A true and accurate copy of a letter provided by the Singapore Prison Service evidencing the travel restriction is attached herein as Exhibit A. Defendant Squirrels, LLC does not consent to this continuance request.

As a result of this travel restriction, Mr. Forsell has offered to keep the trial date as scheduled and appear remotely at the Pretrial and Trial. Defendant Squirrels, LLC does not consent to Mr. Forsell's remote appearance. Mr. Forsell remains willing to appear at the Pretrial and Trial remotely.

This continuance request is necessary for Mr. Forsell to maintain his cause of action. It is not sought for the purpose of causing delay and will not be prejudicial to the Court or any of the parties in this case.

Respectfully submitted,

/s/- Thomas L. Sooy

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of June 2025, the forgoing Motion to Continue was served via ordinary US mail and/or electronic mail upon the following:

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Attorney for Defendant Squirrels, LLC

/s/- Thomas L. Sooy
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